

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re: Michelle O. Baker,

Debtor.

Case No. 12-26899
Judge: SVK
Chapter 13

**OBJECTION TO MOTION OF U.S. BANK TRUST N.A. FOR RELIEF FROM
AUTOMATIC STAY**


The above-mentioned Debtor, by her attorney Kyle R. Knutson, hereby objects to the Motion of the U.S. Bank Trust N.A. for Relief from the Automatic Stay, and in support thereof, alleges as follows:

1. Debtor filed this Chapter 13 case on May 7, 2012.
2. Debtor admits to falling behind on her land contract payments.
3. Debtor asserts that she fell behind because ownership and servicing of the mortgage has changed several times since she entered into the land contract, and some of her payments may not have been forwarded to the correct servicers. In addition, Debtor's payments are allegedly \$1,115.84 per month according to the motion for relief, but this is not consistent with the land contract, which requires \$701.00 per month, including property taxes and insurance.
4. Debtor further asserts that she will stay current in future payments to Movant. However, Debtor requests documentation to verify the correct amount of her monthly payments, as well as the basis for that amount, if higher than \$701.00, and a post-petition payment history.
5. Debtor requests that the post-petition arrears as well as fees and costs associated with this motion be placed into the plan as a supplemental claim.
6. Debtor requests that the Motion for Relief from Automatic Stay be denied and that the Court grant her a hearing on the matter

Dated this 7th day of April, 2015.

Respectfully Submitted,

By: _____


Attorney Kyle R. Knutson

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CERTIFICATE OF SERVICE

The undersigned, Cathy Czopp of Lombardo Law Office, does hereby certify that a copy of this Certificate of Service and a copy of the attached Objection to Motion for Relief were mailed to the persons mentioned below, at their respective addresses, postage prepaid, by depositing them in the U.S. Mail at Wauwatosa, WI on April 7, 2015:

Michelle Baker
PO Box 18712
Milwaukee, WI 53218

The undersigned, Cathy Czopp, further certifies that service of the above-referenced documents was made by ECF Notice of Electronic Filing to the following parties:

Rebecca R. Garcia, Chapter 13 Trustee
Office of the United States Trustee
Gerald J. Mayhew, Attorney for U.S. Bank Trust N.A.

Dated this 7th day of April, 2015.

By: 
Cathy Czopp

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